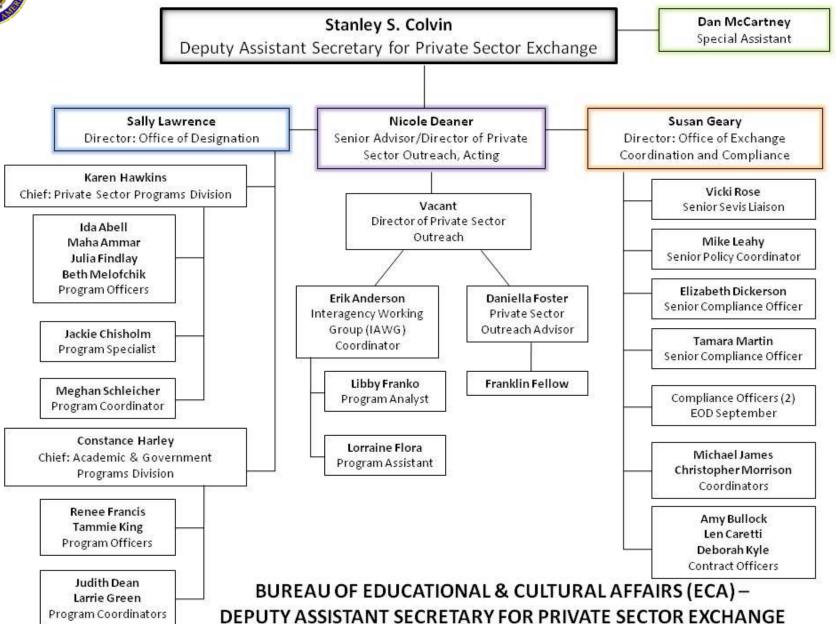


DEPARTMENT OF STATE

CSIET Annual Conference

Friday, October 23, 2009







OFFICE MOVE

New Address:

SA-5 5th Floor Department of State 2200 C Street, NW Washington, DC 20522-0505 **New Contact Numbers:**

Main Line: 202-203-5096

Maha Ammar: 202-632-9293

Meghan Schleicher: 202-632-9303

Fax Number: 202-632-2701

Web Site: http://exchanges.state.gov/jexchanges



PROPOSED REGULATIONS

- Advanced Notice of Proposed Rule
 Making Secondary School Students
 - Comment Period Ended: October 2, 2009
 - ≥ 101 Comments received

- •Proposed Rule Subpart A
 - Comment Period Ends: November 23, 2009

PRIVATE SECTOR PROGRAMS DIVISION GOAL

Improve and Streamline Communication



1-800 NUMBER LAUNCH

Contact Number: 1-866-283-9090

*Should be indicated on the EV ID Card

Launch Date: August 1, 2009

Purpose: It is an added means for exchange

students, host families, and third parties

to report circumstances impacting the

health, and safety of exchange students.



1-800 NUMBER STATISTICS

Who is calling?

Caller	Total Calls
Host Family Member	26
Involved EV	16
Health Care Provider	7
Concerned Citizen	7
Neighbor	3
Sponsor Field Staff	3
Third Party	3
Sponsor Staff, Other	2
Anonymous	2
Bank Employee	1
EV Friend	1
Friend of Host Parent	1
Medical staff and/or collector	1
Natural Family	1
School Official	1
Grand Total	75

Why are they calling?

2009 Call Topics	August	September	October
Logistical Coordination Request	8	11	7
Complaint about Host Family	3	6	3
Health Insurance Coverage	1	7	1
Complaint about Local Staff	1	2	7
Visa Issues	4	1	2
School placement concern	2	1	
Unsuitable Living Conditions	1	1	
Health Concern	1		1
Inquiry about the 1800 Number	1		
Sufficient sponsor staffing concern	1		
Regulation Question		1	
Complaint about EV		1	
Grand Total	23	31	21



REMINDERS

Annual Report Due Date:

ACADEMIC YEAR, JULY 31

Placement Report Due Dates:

AUGUST 31 AND JANUARY 15

Allotment Request Due Date:

JUNE 30

Forms and Monthly Reports:

Sponsors must ensure forms and reports are completed by **FIELD STAFF**. The information provided must be accurate and complete.

It must also be submitted in a legible format!



SEVIS UPDATE REMINDERS

Subpart F - CFR 62.70(b) Current U.S. address:

Sponsors shall ensure that the actual current U.S. address of all sponsored participants is reported in SEVIS under "Current U.S. Address". A sponsor's failure to update the actual U.S. address information within 21 days of a move may be grounds for revocation of their Exchange Visitor Program status.

Site of Activity Update:

The names and addresses of the schools exchange students are currently attending should be updated in SEVIS under the "Site of Activity".

Sponsor Profile Update:

Designated sponsors are urged to update their program profile information in SEVIS. The contact information of ROs and AROs must be updated in SEVIS to facilitate communications between the sponsor and the Department.



REPORTING REQUIREMENTS

Why? Because regulation requires it...

Subpart B – Specific Program Provisions

- 22 CFR 62.25 Secondary School Students
- (m) Reporting Requirements.

Sponsors must <u>immediately</u> report to the Department any incident or allegation involving the <u>actual</u> or <u>alleged</u> sexual exploitation or abuse of an exchange student participant.

Sponsors must also report such allegations as required by local or state statute or regulation.

Subpart A - General Provisions

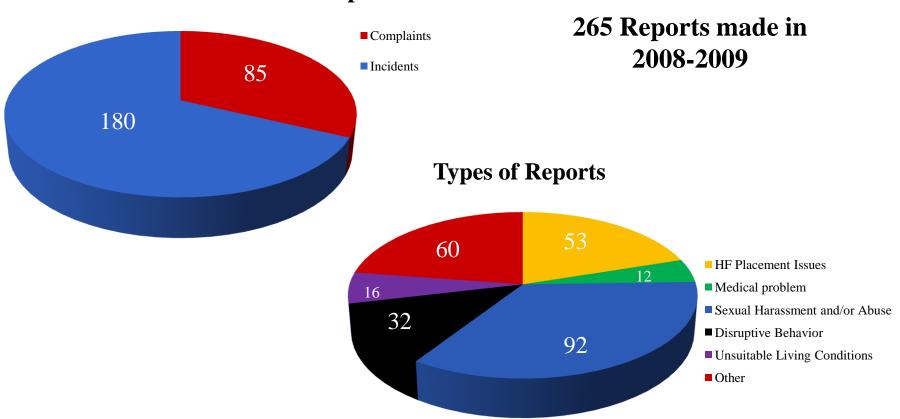
- 22 CFR 62.13 Notification Requirements
- (b) Serious problem or controversy.

Sponsors shall inform the Department of State **promptly** by telephone (confirmed promptly in writing) or facsimile of any serious problem or controversy which could be expected to **bring the Department of State or the sponsor's exchange visitor program into <u>notoriety</u> or <u>disrepute</u>.**



2008-09 REPORTING STATISTICS

2008-2009 Academic Year Reports





REPORTING INITIATIVES

- •Ease program sponsor ability to report
- •Improve Department ability to analyze what you report

thus...

•Improve and streamline communication



REPORTING EVOLUTION

- 2007-08 Microsoft Word Document ➤ Standardized Report Format
- 2009-10 Microsoft InfoPath Report
 Standardize Data Format
- 2010-11 Web Based Reporting



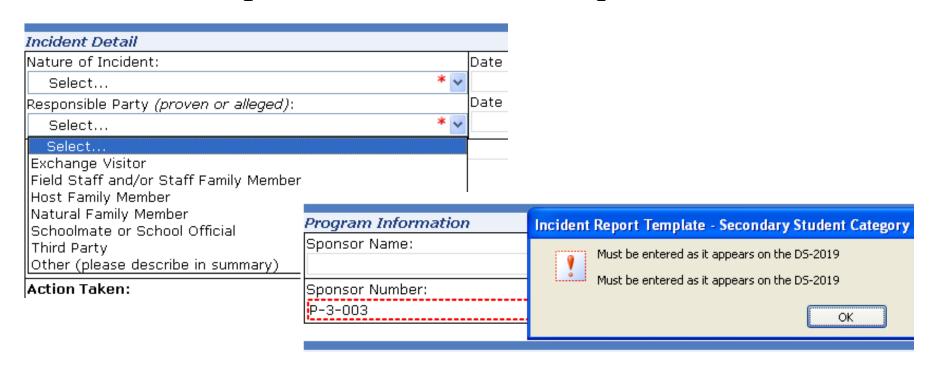
Reporter Information		* an	nd 🛄 items are required fields	
ast Name:	First Name:		Title (Ex. RO, ARO, Director):	
3	*			
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)ate:	Choose one op	rtion:		
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Program Information				
Sponsor Name:		Local Coordinate	tor:	
	×	k		
Sponsor Number:		Regional Manage	er/Director:	
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Participant Information		Drogram Datas:		
	,	Program Dates:	Day Wass I	
ast		Start Month		
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Country of Citizenship:		Date of Birth:		
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SEVIS ID:		Name of School	:	
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Previously Hosted?	Telephone:		Zip:	
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ncident Detail				
lature of Incident:		D	ate Incident Occurred:	
Select		* 🗸		
Responsible Party <i>(proven or a</i>	alleged):	D	ate 1st Reported to Sponsor:	
Select		* 🗸	* 🖽	
Summary of Incident:				

Action Taken:			_
a) Local Police Aut	hority Notified? ONOOY	es - Date Notified:	
Point of contac		Telephone:	
Charges Filed?	○No ○Yes ○Decision P	Pending	
b) Local Social Ser	vice Agency Notified? ON	o Oyes - Date Notified:	=
Point of contac	: Name:	Telephone:	
ic) School Official N	Jotified? ONo OYes - Da	te Notified:	=
Point of contac		Telephone:	
d) Participant Rem	oved from Host Home? <mark>O</mark> N		
Family Name:		State: Select	~
Telephone:		Zip:	
Select: OInte	rim Family OPermanent	Family	
e) Overseas Partni	er Name:	* Country:	
Contacted?	No OYes Date of Conta		
Next Steps/Propo			
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STANDARDIZED DATA

Drop Down Menus and Required Fields





Numbers Are Our Friends

- □ Compliance Office Changes
- Data Requests
- Management Audits



Compliance Is Growing

- □ Director: Susan Geary
- □ Senior Private Sector Compliance Officer:
 - Elizabeth Dickerson
- □ New Compliance Officers *from the other side*:
 - Wendy Armstrong and Kimi Wetterauer
- □ Program Coordinators:
 - Michael James and Christopher Morrison
- □ Four additional positions



Purpose of the Compliance Office

- Data collection and analysis
- Education and dissemination of information
- □ Last resort: sanctions

Remember the Exchange Visitor Program is a cornerstone of American foreign diplomacy



Changing How We Do Business

- Moving from anecdotal evidence to statistically valid industry-wide trends
- Moving from ad hoc data collection to routine data collection
- Moving from manual analysis to streamlined analysis
 - Placement Report Analysis
 - Likely will require additional fields in next report



Everyone Benefits from Data Collection and Analysis

- □ Identifies areas where improvement is needed
 - Sponsors can focus their efforts
 - DOS can provide guidance, re-evaluate regulations, take other actions
- □ By-Products: What everyone wants to know
 - Historical trends
 - Sizing the industry and sponsors
 - Where do they come from? / Where do they go?



DR-1 and DR-2

- □ DR-1 covered 2006 2007 Academic Year
- □ DR-2 covered 2007 2008 Academic Year
- □ Top 20 largest secondary school sponsors covering 75% of exchange students
- □ Sponsor-specific results provided to participating sponsors

We'll discuss the results shortly....



Is there a DR-3?

- □ Yes
 - But data collection postponed until January 2010
- □ Advantages of new timing:
 - Will not coincide with October CSIET data collection
 - Will not interfere with placement season



Transition to the DOS Audit

- □ Subpart A published in Federal Register: September 2009
- □ Realistic adoption of rules: Summer 2010
- **□** Optimistic scenario:
 - DOS Audit debuts in October 2010
- **□** Worst case scenario:
 - CSIET Audit in October 2010
 - DR-4 in January 2011
 - DOS Audit debuts in October 2011



What Does This Mean?

□ Calendar 2009

- Results of DR-1 and DR-2
- CSIET Audit data collection in October/November

□ Calendar 2010

- DR-3 data collection in January
- Adoption of new Subpart A in Summer
- Optimistic: DOS Audit in October
- Worst Case: CSIET Audit in October



What Does This Mean?

■ Worst Case Calendar 2011:

- DR-4 data collection in January
- DOS Audit in October



What You Want to Know

- Postponing DR-3 data collection until January 2010
- There may be a DR-4
- DOS Audit will adopt CSIET schedule for data collection, i.e., October (after placement season)
- DOS Audit will include CSIET questions



What You Really Want to Know

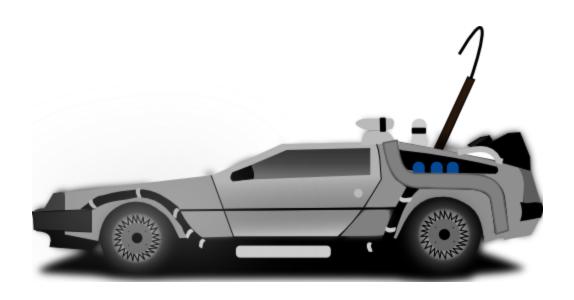
- □ Best or Worst case
 - No need for CPAs twice in same calendar year
 - No simultaneous collection of data
- DOS Audit replaces Data Requests
- □ All sponsors (not just top 20) will perform DOS Audit



Let's pause for questions on the transition from DR and CSIET Audit to DOS Audit



Now, Back from the Future!





What Do We Use DRs For?

- ☐ Initiated to determine extent of noncompliance with Criminal Background Check requirement
- Stand-in until DOS Audit adopted
- Provides historical data
- Identifies problem areas
- □ Tool for sponsor self-evaluation and adjustment of operating procedures



What Do We Use DRs For?

- Provides framework in which to evaluate other operational information
- \square So far not the basis of sanctions \bigcirc
- Expect to see increasing trends of compliance
- □ DOS audit will pick up where the DRs leave off



Finally, the Results!

- □ DR-1 and DR-2 measured compliance in:
 - Host Family Applications
 - Host Family Interviews (new category)
 - Character References
 - Criminal Background Checks
 - Student Notifications
 - Complete Records
 - School Placements



Finally, the Results!

■ Average rate of compliance overall: 86.5%

86.5% compliance isn't as good as it sounds!



Here's How It Works!

CATEGORY	STUDENT A	STUDENT B	STUDENT C
CORE 1	NON-	COMPLIANT	COMPLIANT
	COMPLIANT		
CORE 2	COMPLIANT	NON-	COMPLIANT
		COMPLIANT	
CORE 3	COMPLIANT	COMPLIANT	NON-
			COMPLIANT

Introducing the concept of "Complete Records"



Here's How It Works!

- □ 66% compliant in each category
- □ 66% compliant for each student file

But, all students are at risk!



Here's How It Really Works!

- □ 47% compliance in "Complete Records"
 - 53% of all student files were not 100% compliant
- □ 28,000 students in 2007-2008
 - 14,840 joined unscreened families, entered without schools, or weren't notified of placement
 - 9,800 joined unscreened families or entered without schools

How did we evaluate the data?



What Does "Timely" Mean?

□ Initial Placements:

 Documents must be dated (i.e., screening function must be performed) <u>before</u> exchange visitor <u>departs</u> from home country

□ Subsequent Placements:

Documents must be dated <u>before</u> exchange visitor <u>joins</u> the host family

□ Before means:

The <u>day before</u> departing and/or joining



Lenient v. Strict

- □ DR-1
 - Rated function "Timely" if performed <u>on</u> date student departed home country or joined host family
- □ DR-2
 - Tightened standards: must be completed <u>before</u>
- □ Compare 2006-2007 results to 2007-2008 Lenient results apples to apples
- □ Difference between 2007-2008 lenient and strict:

Shows who waits until the last day!

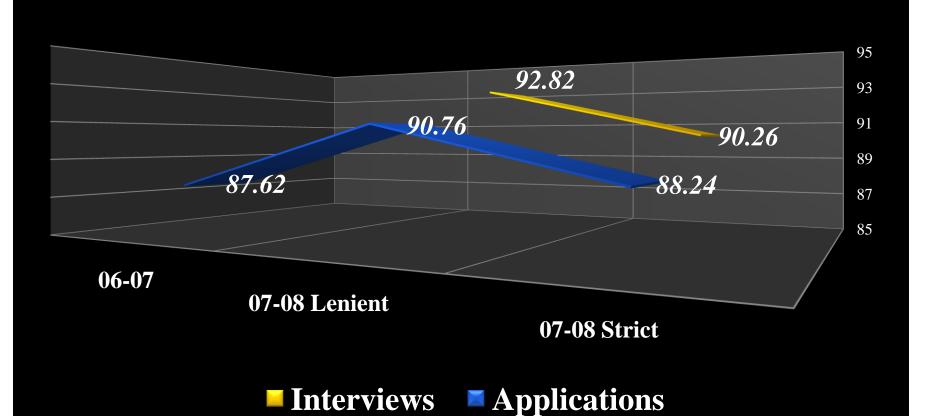


Core Vs. Composite Categories

- □ Core Categories Host Family Screening
 - Host Family Applications
 - Host Family Interview
 - Character References
 - Criminal Background Checks
- □ School placements neither core nor composite
- Composite Categories
 - Notifications and Complete Records
 - Combine results of other categories

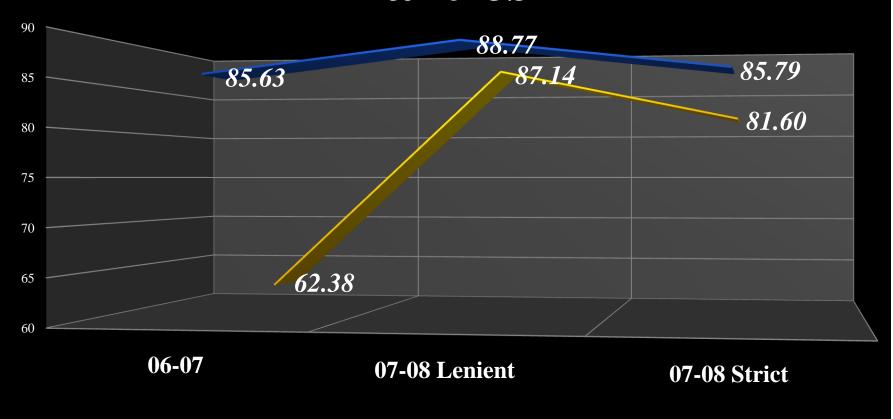


Information from the Families





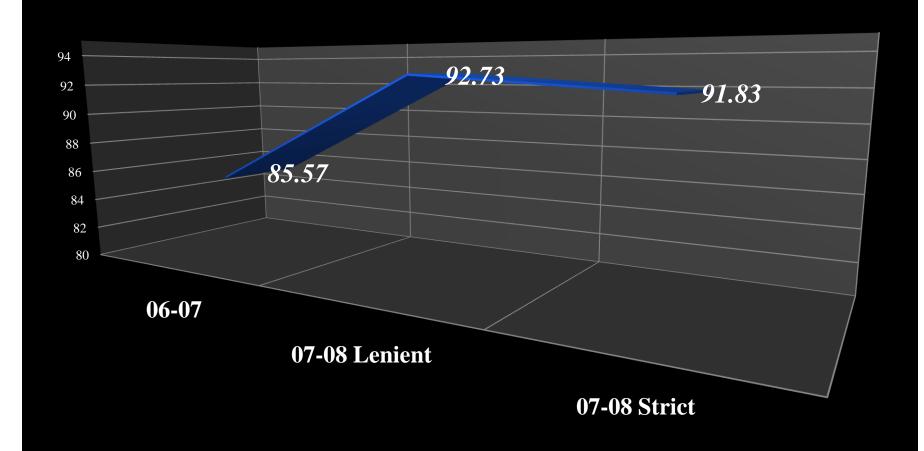
Information from Third Parties



■ Character References **■** Background Checks



School Placements



■ School Placements



Student Notifications

- □ Requires compliance in:
 - Four Core Categories
 - School Placements
- □ Strict and literal measure
- □ Risk of notifying student before host family is fully screened, school secured
- ☐ Trying to ensure students placed in same homes and schools sponsor told them about in advance of their departure

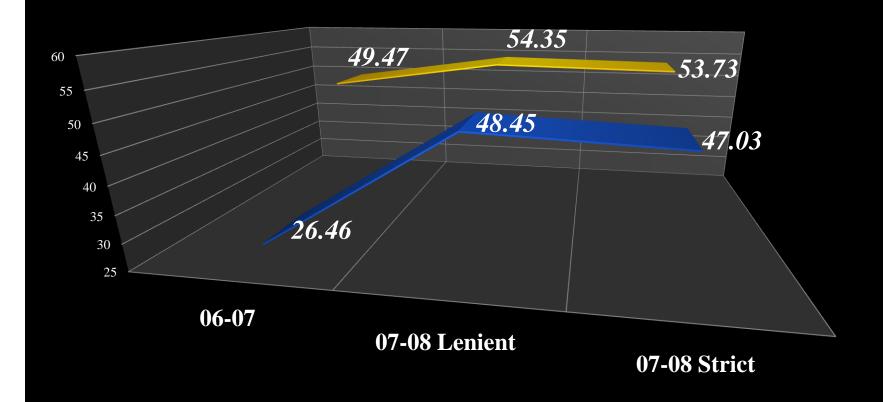


Complete Records

- □ Each student's file has evidence of compliance in:
 - Four Core Categories
 - School Placement
 - Notification
- Lowest score in above is highest possible score in Complete Records



The "Composite" Results



■ Complete Records **■** Student Notification



Looking at Each Category

- □ Small but statistically significant improvement
 - Host Family Applications (88.24%)
 - Character References (85.79%)
 - Notifications (53.73%)
- □ Nearly 20 point improvement
 - Criminal Background Checks (81.60%)
 - Complete Records (47.03%)
- □ Good improvement: Schools (91.83%)
- □ Nice Debut: Interviews (90.26%)



Looking at Individual Sponsors

- □ Host Family Applications (88.24%)
 - 35% significantly improved
 - 35% showed no significant change
 - 30% significantly declined
- □ Host Family Interviews (90.26%)
- □ Character References (85.79%)
 - 25% significantly improved
 - 65% showed no significant change
 - 10% significantly declined
- □ Criminal Background Checks (81.6%)
 - 80% significantly improved
 - 20% showed no significant change



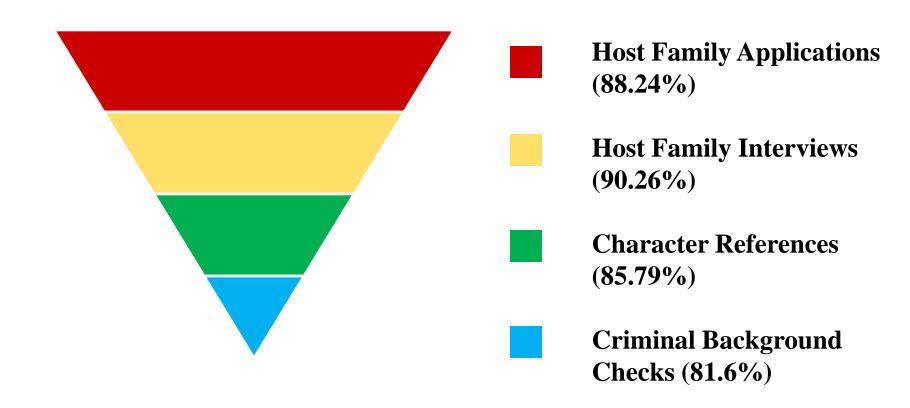
Looking at Individual Sponsors

- □ School Placements (91.83%)
 - 45% significantly improved
 - 45% showed no significant change
 - 10% significantly declined
- □ Student Notifications (53.73%)
 - 40% significantly improved
 - 20% showed no significant change
 - 40% significantly declined
- □ Complete Records (47.03%)
 - 65% significantly improved
 - 25% showed no significant change
 - 10% significantly declined



Looking at Trends

Compliance declines during screening process





What Does This Mean?

- □ Diminished enthusiasm?
- Last steps take more effort?
- □ Running out of time?

Are there some best practices we can share?



Why Does This Matter?

- Host Families Applications and Interviews
 - They put themselves in good light!
- □ Third Party Information Gathering
 - Completes the total picture
- Notifications
 - Helps young participants in planning
 - Helps them adjust to change
- Complete Records
 - Indicates vulnerabilities on a per-student basis



The Grand Finale

Thank You Any Questions?